

9

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES,

Plaintiff

No. 17-20311

-v-

Hon. Nancy G. Edmunds

GLENN TILL,

Defendant

MOTION FOR SENTENCE MODIFICATION
UNDER 18 U.S.C. SECTION 3582(C)(1)(A)(i)
AND REQUEST FOR APPOINTMENT OF COUNSEL

Defendant, Glen Till, moves the Court for an order reducing his sentence due to his vulnerability to the COVID-19 virus, the BOP's refusal to treat his serious medical condition, and the conditions of his confinement which violate the Eighth Amendment's prohibition against cruel and unusual punishment.

Since Mr. Till's confinement in the custody of the BOP at FCI Cumberland, the COVID-19 virus has infected half of the prison's inmate population, the last wave or outbreak

causing infections amongst sixty of the inmates in his 128-man housing unit.

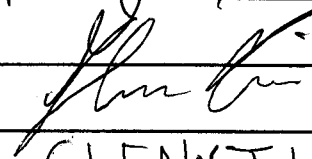
The prison's medical department does not segregate COVID-19 positive prisoners from healthy inmates. In January, when half of the prisoners in Mr. Till's housing unit contracted the COVID-19 virus, the prison staff refused to segregate these sick prisoners from the rest of the housing unit inmates who were healthy including Mr. Till. This policy places Mr. Till at serious risk for severe illness or death according to the CDC as he is severely obese ($BMI > 40$) and has other underlying medical conditions that the CDC indicates render him vulnerable to COVID-19 (see www.cdc.gov/coronavirus).

In addition, Mr. Till has a serious medical need for treatment that the BOP medical staff has indicated to him that they "cannot treat" and will need to be taken care of "when [he] returns home from prison." Mr. Till wishes to submit evidence of his above medical condition via his appointed counsel — should the Court grant his request for counsel — and via seal.

Mr. Till made a request to the warden of his prison for compassionate release and 30 days have lapsed since this request was made. Exhibit A is a copy of the request Mr. Till made to his warden on 12-4-2020 for compassionate release.

Due to Mr. Till's lack of legal skill, indigence, and the emergency nature of the instant motion, he humbly requests that the Court appoint him counsel to submit a memorandum of law on the merits of his compassionate release petition, collect and submit relevant documents in support, and to obtain his medical records for sealed filing with the Court.

Respectfully submitted,



GLENN TILL

Prisoner # 55564-039

FCI Cumberland

P.O. Box 1000

Cumberland, Md. 21501

Pursuant to 28 U.S.C. section 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of March 2021 at Cumberland, Maryland.

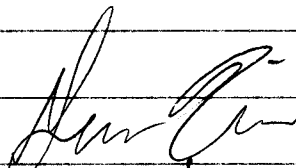

GLENNTILL

EXHIBIT A

BP-A148.055

INMATE REQUEST TO STAFF CDFRM

SEP 98

U.S. DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF PRISONS

TO: (Name and Title of Staff Member) WARDEN WEBER	DATE: 12-4-2020
FROM: GLEN TILL	REGISTER NO.: 55564-039
WORK ASSIGNMENT: N/A	UNIT: C-1

SUBJECT: (Briefly state your question or concern and the solution you are requesting. Continue on back, if necessary. Your failure to be specific may result in no action being taken. If necessary, you will be interviewed in order to successfully respond to your request.)

I'M REQUESTING RELEASE (COMPASSIONATE RELEASE) UNDER 18 U.S.C. SECTION 3582(C)(1)(A)(i) DUE TO MY VULNERABILITY TO COVID-19 AS EVIDENCED BY MY MEDICAL RECORDS. MY HOME PLAN IS TO RESIDE WITH MY GIRLFRIEND AT 12753 PAYTON, DETROIT, MICHIGAN. IF ANY ADDITIONAL INFORMATION IS NECESSARY, PLEASE LET ME KNOW.

(Do not write below this line)

DISPOSITION:

Signature Staff Member	Date
------------------------	------

Record Copy - File; Copy - Inmate
(This form may be replicated via WP)

This form replaces BP-148.070 dated Oct 86
and BP-S148.070 APR 94

FILE IN SECTION 6 UNLESS APPROPRIATE FOR PRIVACY FOLDER

SECTION 6



FCI / FPC CUMBERLAND, MD

SPO Purchase Pre-Authorization Form



Any of the SPO products listed below **MUST** have the Unit Team's Stamp and/or Signature approving the purchase.

Forms that are not **COMPLETELY** filled out properly **WILL NOT** be processed for purchase.

All form denials will be posted at the shopping window. Reason regarding any denial will be given upon request, after **ID Verification**.

****MONEY MUST BE AVAILABLE IN ACCOUNT BEFORE SUBMISSION****

Inmate Name : _____ Reg. Number : _____

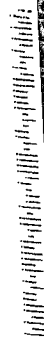
Housing Unit : _____ Date MM/DD/YY : _____

ITEM	BRAND	MODEL	SIZE	STAMP / SIGNATURE
Athletic Shoe				
Specialty Shoe				
Specialty Boot				
Religious Headwear				
Radio Player			N/A	
MP3 Player			N/A	
Watch			N/A	
Headphones			N/A	
Other				

GLEN TILL # 55564-039
FEDERAL CORRECTIONAL INSTITUTION
P.O. BOX 1000
CUMBERLAND, MD. 21501-1000

RECEIVED
MAR 29 2021
CLERK'S OFFICE
U.S. DISTRICT COURT

U.S. COURTHOUSE
231 WEST LAFAYETTE BLVD
DETROIT, MI 48226
MAIL ROOM



3-13-21



FEDERAL CORRECTIONAL INSTITUTION
JAIL
P.O. BOX 282
JAIL
IF THE PRISONER HAS BEEN RELEASED
OR TRANSFERRED TO ANOTHER FACILITY
PLEASE RETURN TO THE ADDRESS FOR
DELIVERY OF MAIL TO THE
FACILITY FOR RETURN
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